

## **Frequently Asked Questions:**

Regarding Construction of Commercial Modular (CM) Manufactured Homes (MH) for Compliance with Title 25, California Code of Regulations (“25 CCR”), Chapter 3, Article 2.3: **Ignition Resistant Construction Regulations**, and Title 24, California Code of Regulations, Part 2, Chapter 7A (“Chapter 7A”)

### **1. Do exterior labeled doors and windows have to be rated?**

A1. Each must comply with the prescriptive requirements of Chapter 7A, sections 704.3.2.2 – 704.3.2.3. Solid wood doors meeting those requirements would not have to be labeled. Tempered glass is a labeled product and does not have to possess a fire-resistive rating of not less than 20 minutes to comply with Chapter 7A.

### **2. Is it permissible to use wood/combustible material as exterior trim?**

A2. Yes.

### **3. If an exterior 20-minute door is altered with tempered glass, will it be in compliance? What if it is built with a noncombustible material?**

A3. Alterations to an exterior fire-resistive door would not be allowed unless permitted by the door listing and installation instructions. Unlisted exterior solid wood doors altered to install glass panels must comply with the requirements of Chapter 7A, sections 704A.3.2.2 and 704A.3.2.3, for door thickness, and tempered glazing. Listed noncombustible material installed upon or within a 1-3/8 inch thick solid wood door would be permissible.

### **4. Do dryer vents or range hood vent terminations need to comply with Chapter 7A?**

A4. No.

### **5. Which does Chapter 7A address: Class A roof covering or Class A roof covering assembly?**

A5. Current Chapter 7A language addresses a roofing covering assembly installed in accordance with its listing and the manufacturer’s installation instructions.

### **6. Do skylights or solar tubes need to be made of fire resistant material?**

A6. No.

**7. Are commercial modular lease fleets with metal roofs in compliance with Chapter 7A?**

A7. It depends. HCD would need to review the roofing product, listing and installation instructions to determine compliance with section 704A.1.

**8. Which fire-rated class of roofing materials should be used in WUI areas?**

A8. Refer to the California Building Code ("CBC"), 24 CCR, Part 2, Chapter 15, section 1505.

**9. Who is designing and manufacturing required WUI certification labels for placement inside CM and MH units?**

A9. Manufacturers, owners, contractors or other persons must closely follow or copy the format provided by regulation in 25 CCR, Chapter 3, Article 2.3, section 4214.

**10. How does one determine if a client's manufactured home or commercial modular unit is located in WUI area?**

A10. A local authority in each jurisdiction has responsibility for these determinations. That office or individual must be contacted for that information. Neither the Department nor the Office of the State Fire Marshal maintains such information on a site-by-site basis.

**11. If a unit is labeled as complying with Chapter 7A and is moved and installed in a new location, does it have to meet any newly-enacted provisions of Chapter 7A?**

A11. At this time, each installation or reinstallation of a manufactured structure would be treated as a new installation and subject to the requirements of that location, except for any local ordinances enacted that exceed the requirements of Chapter 7A.

**12. Do all exterior materials need to be listed with the Office of the State Fire Marshal (OSFM)?**

A12. No. 25 CCR Article 2.3 regulations adopt CBC Chapter 7A. Within Chapter 7A are the exterior wall, roof, roof venting construction requirements that apply to MH and CM construction or alteration. Chapter 7A often allows a method of construction or use of an OSFM-listed material. Carefully read both Article 2.3 and Chapter 7A, including the exceptions.

**13. Do access doors to exterior mechanical or water heater rooms have to meet Chapter 7A?**

A13. Yes, the exterior materials used to fabricate an access door, or a purchased door, to such rooms have to meet Chapter 7A requirements. Exterior mechanical access room doors fabricated from a single sheet of listed noncombustible siding material would satisfy Chapter 7A, section 704A.3.1. Combustible wall ventilation openings into such rooms also have to meet Chapter 7A, section 704A.3.2.1.

**14. There are dealers and clients resistant to applying the certification label going on the CM interior wall; where else may it be placed?**

A14. It will be permissible to place the label above the dropped ceiling material in a CM if no other interior accessible location is more suitable.

**15. Are manufactured homes already installed in WUI areas grandfathered into the provisions of Chapter 7A at time of installation?**

A15. Yes, if installed prior to the September 1, 2008, effective date, and there are no exterior alterations covered by 25 CCR, Article 2.3 regulations which result in required ignition-resistant construction products and procedures.

**16. Do mobilehome parks and special occupancy parks have to comply with the WUI requirements in Chapter 7A?**

A16. Yes. As of January 21, 2009, in mobilehome parks, all installations and exterior repairs or alterations of mobilehomes and manufactured homes, as well as accessory structures and buildings (e.g., garages, cabanas) and permanent buildings, must comply with 25 CCR, Article 2.3 and Chapter 7A. For special occupancy parks, effective January 21, 2009, all accessory structures and buildings (e.g., garages, cabanas) and permanent buildings, must comply with 25 CCR, Article 2.3 and Chapter 7A.

**17. Can an existing manufactured home, sited in a WUI fire area prior to September 1, 2008, that doesn't meet Chapter 7A be rented?**

A17. Existing manufactured homes, mobilehomes, multifamily manufactured homes, commercial modular units do not have to be altered to meet the new ignition resistant requirements when offered for rent or upon resale or lease unless they are reinstalled at a new site or altered in place.